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CHRIS PRINCIPE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE,)	Case No. 8:17-cv-00608 JLS (KESx)
Plaintiff,)	
v.)	DECLARATION OF HOWARD A.
)	KROLL IN SUPPORT OF REQUEST TO
TIMOTHY GLEN CURRY A/K/A)	CLERK TO ENTER DEFAULT
TIMOTHY TAYSHUN,)	Hon. Josephine L. Staton
Defendant.)	

I, Howard A. Kroll, declare:

1. I am a partner at Tucker Ellis LLP, and represent Plaintiff Chris Principe ("Plaintiff") in the matter referenced above. I submit this declaration in support of Plaintiff's Request for Clerk to Enter Default against Timothy Glen Curry aka Timothy Tayshun on the grounds that Defendant failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. The statements made in this declaration are based on my own personal knowledge or records regularly maintained in the ordinary course of Tucker Ellis's business and, if sworn as a witness, I could testify competently thereto.

2. The Summons, Complaint and related documents were served on Defendant on July 12, 2017. See Docket No. 11.

3. Pursuant to Fed. R. Civ. P. 12(a), Defendant was required to serve its answer within 21 days after being served with the Summons and Complaint. The deadline for Defendants to answer, therefore, was August 2, 2017. Defendant has not yet filed its answer or any responsive papers.

/s/Howard A. Kroll